

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**NOTICE OF MOTION OF RECEIVER FOR ENTRY AN ORDER
(I) ENFORCING THE SALE ORDER AND ASSET PURCHASE AGREEMENT AND
(II) COMPELLING PERFORMANCE BY LTS SYSTEMS, LLC**

PLEASE TAKE NOTICE that, upon the accompanying *Memorandum of Law* and *Declaration of Kevin J. O'Brien* (the “O'Brien Decl.”), Michael Fuqua, as receiver (the “Receiver”) for Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc., by and through his counsel, will move the Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, for an order (i) enforcing the Sale Order and APA and (ii) compelling performance by LTS Systems, LLC (i.e., payment of the Assumed Liabilities for the costs and expenses of the Receivership Estate).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s order (Doc. 499) approving and adopting the expedited motion schedule, responses to the Motion must be filed by July 24, 2025.

Dated: July 21, 2025
New York, New York

Respectfully submitted,

KING & SPALDING LLP

By: /s/ Kevin J. O'Brien
Kevin J. O'Brien (SBN 5983713)
KING & SPALDING LLP
1185 Avenue of the Americas, 34th Floor
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
E-mail: kobrien@kslaw.com

-and-

Thaddeus D. Wilson
KING & SPALDING LLP
1180 Peachtree Street NE
Atlanta, Georgia 30309
Telephone: (404) 572-4600
Facsimile: (312) 572-5100
Email: thadwilson@kslaw.com

*Counsel for Michael Fuqua, in his capacity as
Receiver of Theia Group, Inc., Theia Aviation, LLC,
and Theia Holdings A, Inc.*